

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

OKLAHOMA STATE DEPARTMENT OF  
EDUCATION, and  
RYAN WALTERS, in his official capacity  
as Superintendent of Public Instruction,  
and in his individual capacity,

*Plaintiffs,*

v.

FREEDOM FROM RELIGION  
FOUNDATION,

*Defendant.*

Case No. 6:25-cv-94-JFH

Hon. John F. Heil, III

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE  
REPLY BRIEF IN FURTHER SUPPORT OF DEFENDANT'S MOTION TO DISMISS**

Defendant respectfully requests, pursuant to LCvR 7.1(e), that the Court extend the deadline to file Defendant's reply brief in further support of its Motion to Dismiss Plaintiffs' Complaint by seven (7) days. Doc. 17. In support of this request, Defendant states as follows:

1. On May 9, 2025, Defendant filed its Motion to Dismiss Plaintiffs' Complaint. Doc. 17.
2. On May 23, 2025, Plaintiffs filed their response to the Defendant's Motion to Dismiss. Doc. 24.
3. Under LCvR 7.1(e), Defendant's deadline to file a reply brief in further support of its Motion to Dismiss was set to June 6, 2025 by default.
4. Defendant respectfully request that this Court extend the deadline to submit a reply brief in further support of its Motion to Dismiss by seven (7) days to June 13, 2025.
5. Defendant has not made any other requests to extend a filing deadline in this matter.

6. Counsel for Defendant have conferred with counsel for Plaintiffs prior to filing this motion. Plaintiffs do not object to an extension of seven days.
7. One member of the Defendant's legal team, Adam Hines, will be out of office from May 23, 2025 to June 1, 2025. Another member, Megan Lambert, has a conflicting briefing deadline in *Padres Unidos de Tulsa, et al. v. Drummond, et al.*, No. 24-cv-511 (W.D. Okla.)
8. Other members of Defendant's legal team, Vera Eidelman and Scarlet Kim, have a conflicting briefing deadline in *Rhode Island Latino Arts v NEA*, No. 1:25-cv-79-WES (D.R.I.).
9. Granting this motion will not affect any other deadlines.

**WHEREFORE**, Defendant respectfully requests that the Court extend the time to file its reply in further support of Defendant's Motion to Dismiss until June 13, 2025.

Date: May 27, 2025

Respectfully submitted,

/s/ Megan Lambert

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2025, I electronically filed the foregoing document with the Clerk of Court via the Court's CM/ECF system, which effects service upon all counsel of record.

Respectfully submitted,

*/s/ Megan Lambert*  
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